

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS (BOSTON)

In re:

LEV GOLDFARB and
LYDMILA ROGALIN,
Debtor

Chapter 13
Case No. 16-12339

EUGENE PELIKOV,
Plaintiff
Vs.

Adversary Proceeding
No: 16-01131

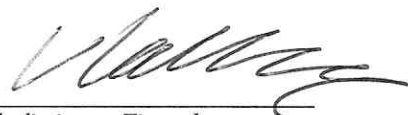
GOLD AND FARB, INC.,
LEV GOLDFARB,
ALEXANDER GOLDFARB AND
LYDMILA ROGALIN
Defendants.

STATEMENT UNDER OATH PURSUANT TO RULE 7037-1(b) OF MASSACHUSETTS
LOCAL BANKRUPTCY RULES

I, Vladimir von Timroth, counsel for the Debtors state under oath to the best of my knowledge, information and belief, as follows:

1. On or about February 21, 2017, I delivered a letter under Rule 7037-1 of MLBR (to counsel for the Eugene Pekikov, Attorney Val Gurvits, via e-mail transmission. **Exhibit "A"**
2. As of the date of this Statement I have not received a response from Attorney Gurvits to the Rule 7037-1 Letter.
3. On or about March 6, 2016, Attorney James Ehrhard advised the affiant to the effect that he did not receive a response to the February 21, 2017 request for the discovery conference.
Exhibit "A"

SIGNED UNDER PENALTIES OF PURJURY.



Vladimir von Timroth

DATED: March 07, 2017

EX A



Vladimir von Timroth <vontimroth@gmail.com>

Discovery

4 messages

Vladimir von Timroth <vontimroth@gmail.com>
To: Val Gurvits <vgurvits@bostonlawgroup.com>
Cc: "James P. Ehrhard" <ehrhards@ehrhardslaw.com>

Tue, Feb 21, 2017 at 1:57 PM

Dear Val, please accept this correspondence as an attempt to mediate a potential discovery dispute. This request is made pursuant to MLBR 7037-1 Under the rule we need to confer within next 10 day. You need to reach out to me and attorney Ehrhard to schedule a conference within next 7 days.

The scope of the dispute is outlined in the attached motion which we intend to file if our attempts to settle the dispute fail.

Best,
Vladimir

—
Law Office of Vladimir von Timroth
405 Grove Street, Suite 204
Worcester, MA 01605
(508) 753 2006 telephone
(774) 221 9146 facsimile

THIS E-MAIL IS INTENDED ONLY FOR THE PERSONAL AND CONFIDENTIAL USE OF THE ADDRESSEES. THIS MAY BE AN ATTORNEY-CLIENT COMMUNICATION AND AS SUCH IS PRIVILEGED AND CONFIDENTIAL. IF YOU ARE NOT THE INTENDED RECIPIENT, ANY DISCLOSURE, COPYING, DISTRIBUTION OR USE OF THE CONTENTS OF THIS MESSAGE IS PROHIBITED. IF YOU HAVE RECEIVED THIS E-MAIL IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE. THANK YOU.



02 17 2016 Gold and Farb - 02 14 2017 Motion to HOId Status Conference.doc
48K

Vladimir von Timroth <vontimroth@gmail.com>
To: Alex Goldfarb <alex.goldfarb7@gmail.com>

Tue, Feb 21, 2017 at 2:00 PM



[Quoted text hidden]



02 17 2016 Gold and Farb - 02 14 2017 Motion to HOId Status Conference.doc
48K

Vladimir von Timroth <vontimroth@gmail.com>
To: "James P. Ehrhard" <ehrhards@ehrhardslaw.com>

Mon, Mar 6, 2017 at 12:18 PM

Jim, did he get back to you to discuss our Motion? It's been 13 days and I have not heard from him. Vlad

----- Forwarded message -----

From: **Vladimir von Timroth** <vontimroth@gmail.com>
Date: Tue, Feb 21, 2017 at 1:57 PM
Subject: Discovery
To: Val Gurvits <vgurvits@bostonlawgroup.com>
Cc: "James P. Ehrhard" <ehrhards@ehrhardslaw.com>

[Quoted text hidden]

3/7/2017

[Quoted text hidden]



02 17 2016 Gold and Farb - 02 14 2017 Motion to HOId Status Conference.doc
48K

James Ehrhard <ehrhard@ehrhardlaw.com>
To: Vladimir von Timroth <vontimroth@gmail.com>

Mon, Mar 6, 2017 at 12:21 PM

No. Nothing.

James P. Ehrhard, Esq.
Ehrhard & Associates, P.C.
250 Commercial Street, 4th Floor
Worcester, MA 01608
tel: 508.791.8411
www.ehrhardlaw.com

[Quoted text hidden]